

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

DONALD A. CHAMBERLAIN,

Plaintiff,

v.

**LAZEGA & JOHANSON, LLC,
and TRANSWORLD SYSTEMS,
INC.**

Defendant.

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Case No. 2:17-cv-00121-LGW-RSB

JOINT MOTION FOR EXTENSION OF DISCOVERY END DATE

The parties, by and through their counsel, hereby respectfully move the Court for an Order extending the discovery end date for this matter until May 11, 2018 for the following reasons:

1. On March 27, 2018, the Honorable R. Stan Baker entered a revised Scheduling Order setting new deadlines in this matter as a result of a Motion filed by Defendant Transworld Systems, Inc. (Dkt. 28).

2. The Order set a new deadline for depositions for non-expert witnesses of May 7, 2018.

3. The parties have compared schedules and conferred since the entry of the Order and have agreed upon dates of the parties' depositions on May 8th, 10th, and 11th, 2018. Due to scheduling conflicts of counsel and the parties themselves, the parties were unable to schedule these dates on or before May 7, 2018.

4. For the foregoing reasons, the parties jointly respectfully request a short four (4) day extension to the non-expert deposition deadline until May 11, 2018

WHEREFORE, parties respectfully request that this Honorable Court grant an extension of the deadline for non-expert depositions until May 11, 2018 in accordance with the attached proposed Order.

Respectfully submitted,

/s/ Andrew J. Blady

Andrew J. Blady, Esq.

Admitted *pro hac vice*

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CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2018, a copy of the foregoing was served electronically via CM/ECF on the following:

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